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8 Attorney for Rene Ramirez

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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**
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13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 RENE RAMIREZ,

17 Defendant.

Case No. 2:15-cr-00289-JCM-CWH

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(Third Request)

18 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
19 United States Attorney, and Supriya Prasad, Assistant United States Attorney, counsel for the
20 United States of America, and Yi Lin Zheng, counsel for Rene Ramirez, that the revocation
21 hearing currently scheduled for March 20, 2024 be vacated and set to a date and time convenient
22 to this Court, but no sooner than ninety (90) days.

23 The Stipulation is entered into for the following reasons:

24 1. Mr. Ramirez will be pleading guilty without a plea agreement in his federal
25 SORNA case, 21-cr-215-JAD-NJK.

26 2. The parties anticipate that Mr. Ramirez will be sentenced within 90 days of his
change of plea.

3. Mr. Ramirez's sentence in the SORNA case will affect defense counsel's
sentencing strategy in this case.

1 4. The parties agree to the continuance.

2 5. Mr. Ramirez is in custody and does not object to a continuance.

3 6. The additional time requested herein is not sought for purposes of delay, but
4 merely to allow counsel for defendant sufficient time within which to be able to effectively and
5 complete investigation of the discovery materials provided. Additionally, denial of this request
6 for continuance could result in a miscarriage of justice.

7 This is the second stipulation to continue filed herein.

8 DATED: March 4, 2024.

9 By /s/ Yi Lin Zheng
10 YI LIN ZHENG
11 Counsel for Rene Ramirez

JASON M. FRIERSON
United States Attorney

By /s/ Supriya Prasad
12 SUPRIYA PRASAD
13 Assistant United States Attorney
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RENE RAMIREZ,

Defendant.

Case No. 2:15-cr-00289-JCM-CWH

FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Mr. Ramirez will be pleading guilty without a plea agreement in his federal SORNA case, 21-cr-215-JAD-NJK.

2. The parties anticipate that Mr. Ramirez will be sentenced within 90 days of his change of plea.

3. Mr. Ramirez's sentence in the SORNA case will affect defense counsel's sentencing strategy in this case.

4. The parties agree to the continuance.

5. Mr. Ramirez is in custody and does not object to a continuance.

6. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively and complete investigation of the discovery materials provided. Additionally, denial of this request for continuance could result in a miscarriage of justice.

CONCLUSIONS OF LAW

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for trial, taking into account the exercise of due diligence.

ORDER

IT IS FURTHER ORDERED that the revocation hearing is continued to **June 24, 2024, at 10:00 a.m.**

DATED March 8, 2024.

James C. Mahan
UNITED STATES DISTRICT JUDGE